

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BAMBI WOJTASZEK, on behalf of
herself and similarly situated
employees,

Plaintiff,

v.

BALD EAGLE FUEL & TIRE, INC.,

Defendant.

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Case No. 4:19-cv-00716-RDM

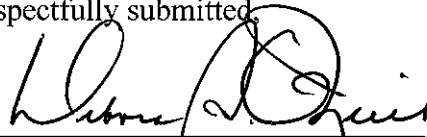
**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT
TO ANSWER PLAINTIFF'S COMPLAINT**

Defendant Bald Eagle Fuel & Tire, Inc. ("Defendant") by and through undersigned counsel hereby moves the Court to enter the attached Consent Order approving the stipulation of the parties that Defendant may have until July 5, 2019 to file an Answer Plaintiff's Complaint and in support avers as follows:

1. A response to Plaintiff's Complaint is currently due on June 5, 2019.
2. Owing to prior professional commitments of Defendant's counsel, counsel has sought a thirty (30) day extension of that deadline and Plaintiff's counsel has agreed.
3. On the basis of that agreement, a response to Plaintiff's Complaint would now be due on July 5, 2019.
4. This extension is unopposed and counsel for the parties have signed a Stipulation and Proposed Consent Order which is attached thereto.

WHEREFORE, Defendant respectfully requests that the Court grant defendant an extension until July 5, 2019 to file an Answer to Plaintiff's Complaint and enter the Consent Order attached hereto.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Debora A. O'Neill', written over a horizontal line.

Debora A. O'Neill (ID No. 35077)

Edward Skipton, Esquire (ID No. 309485)

MEYERSON & O'NEILL

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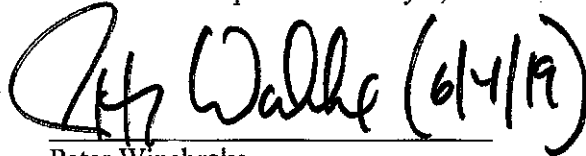
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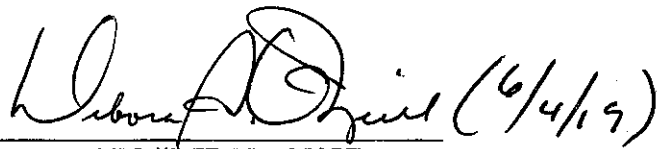
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CONSENT ORDER RE EXTENSION OF TIME TO
ANSWER PLAINTIFF'S COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by counsel for the undersigned parties,
that Defendant Bald Eagle Fuel & Tire, Inc., may have an extension of time to file an Answer to
Plaintiff's Complaint until July 5, 2019.



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Mark J. Gottesfeld
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Attorneys for Defendant

SO ORDERED:

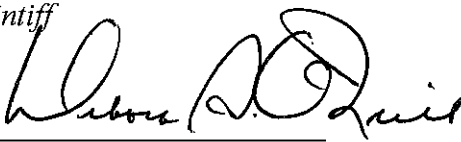
Robert D. Mariani
United States District Judge

CERTIFICATE OF SERVICE

I, Debora A. O'Neill, Esquire, hereby certify that on this date a true and correct copy of the foregoing was served via ECF Filing and U.S. Mail upon the following:

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R. Andrew Santillo
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Attorneys for Plaintiff

Dated: June 4, 2019



Debora A. O'Neill, Esq.